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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. §§ 924(c), 1951(a))

TAMEL HAYNES,

No. 24-MJ-383

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICAH FRIEDMAN, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation duly appointed according to law and acting as such.

On or about May 10, 2024, within the Eastern District of New York and elsewhere, the defendant TAMEL HAYNES did knowingly and intentionally obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from a deli and corner store located on Farmers Boulevard in Queens, New York.

(Title 18, United States Code, Section 1951(a))

On or about May 10, 2024, within the Eastern District of New York and elsewhere, the defendant TAMEL HAYNES did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the Hobbs Act robbery described

above in violation of 18 U.S.C. § 1951(a), and did knowingly and intentionally possess such firearm in furtherance of said crime of violence, which firearm was discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(iii))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I have been a Special Agent with the Federal Bureau of Investigation for over three years. As a member of the Violent Crime Task Force, I have participated in numerous investigations of robberies and similar crimes. I am familiar with the facts and circumstances set forth below from my participation in the investigation as well as my review of the investigative file, surveillance camera footage and reports of other law enforcement officers involved in the investigation.

2. On or about May 10, 2024, at approximately 10:16 a.m., a man, later identified as the defendant TAMEL HAYNES, entered a deli and corner store located on Farmers Boulevard in Queens, New York at an address known to me ("Deli-1"). HAYNES wore a black hooded sweatshirt, blue latex gloves, a surgical mask, black pants with a small white logo on the left leg and black shoes, as depicted below in Figure 1. He brandished a black firearm, pointed it at one clerk's head and then grabbed the same clerk's arm when the clerk tried to escape. HAYNES fired one round from the firearm into the ceiling. HAYNES demanded

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

money and ultimately stole over \$1,000. He also took cell phones from the two clerks who were working.



Figure 1

3. I believe the perpetrator to be the defendant TAMEL HAYNES because, among other reasons and as set forth in greater detail below, surveillance video captured HAYNES (i) before the crime, leaving an apartment building wearing clothing consistent with what HAYNES was wearing as captured in Deli-1's surveillance footage, and (ii) a black BMW 5-Series sedan with tinted windows, black rims and a wind guard on rear windshield (the "Black BMW") was captured on NYPD street cameras before and after the robbery; HAYNES is captured on surveillance footage with the Black BMW earlier on May 10, 2024. Additionally, a license plate observed by law enforcement to be on the Black BMW is registered to an individual who is known to me ("Individual-1") at an address known to me in Valley Stream, New York. HAYNES's New York driver license is registered at the same address as the Black BMW in

Valley Stream, New York. A security guard for this address identified Individual-1 as HAYNES's girlfriend.

Before the Robbery

4. On or about May 10, 2024, at approximately 8:50 a.m., the Black BMW is captured on video surveillance parking near the Rochdale Village apartment complex in Queens, New York. Approximately one minute later, surveillance footage captured an individual getting out of the Black BMW and going into a deli ("Deli-2"). Surveillance footage from inside Deli-2 recorded a man, later identified as the defendant TAMEL HAYNES, in black sweatpants with a small white logo on the left leg, white shoes and a grey sweatshirt, pictured below in Figure 2. A tattoo of a diamond is visible on HAYNES in Deli-2, pictured below in Figure 3; this tattoo matches the tattoo of a diamond on HAYNES from a 2017 photo taken by the New York City Police Department ("NYPD"), pictured below in Figure 4.



Figure 2



Figure 3



Figure 4

5. Surveillance videos captured the defendant TAMEL HAYNES leaving Deli-2 and walking into building 20 in the Rochdale Village apartment complex at approximately 8:55 a.m. Surveillance videos recorded HAYNES in an elevator traveling to the 11th floor of building 20, pictured below in Figure 5. A tattoo of a dollar sign is visible on

HAYNES in video surveillance from the elevator matches which the tattoo of a dollar sign on HAYNES from a 2017 photo taken by the NYPD, pictured below in Figure 6.



Figure 5

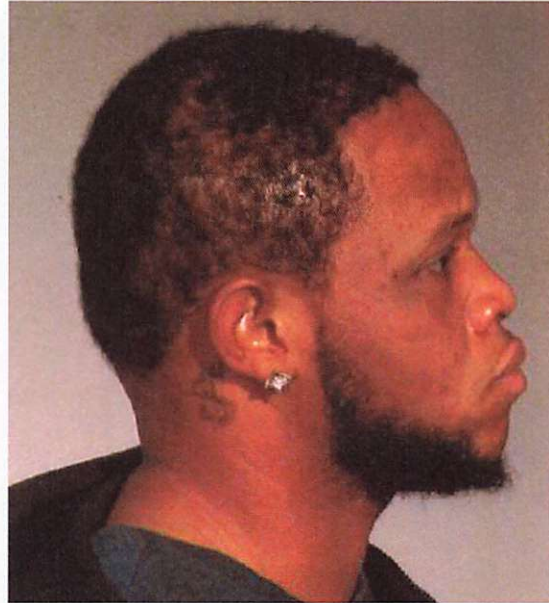


Figure 6

6. At approximately 9:30 a.m., the defendant TAMEL HAYNES got back into the elevator on the 11th floor of building 20. By this time, he was wearing an outfit similar

to the individual who robbed Deli-1: black hooded sweatshirt, black pants with a small white logo on the left leg and black shoes, as depicted below in Figures 4 and 5.



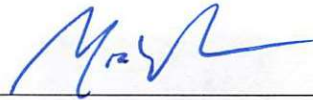
Figure 4



Figure 5

7. Surveillance footage captured the defendant TAMEL HAYNES as he returned to Deli-2. At approximately 9:37 a.m., HAYNES left Deli-2, got into the Black BMW and drove away. Surveillance footage captured the Black BMW parking approximately 20 meters from Deli-1 at approximately 10:12 a.m. HAYNES robbed Deli-1 at approximately 10:16 a.m.

WHEREFORE, your deponent respectfully requests that the defendant TAMEL HAYNES be dealt with according to law.



MICAH FRIEDMAN
Special Agent
Federal Bureau of Investigation

Sworn to before me this
17th day of May, 2024



THE HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK